



Michael A. Vatis  
1155 Avenue of the Americas, Floor 26  
New York, New York 10036  
Direct Dial: 646.328.0494  
Fax: 646.755.3397  
mvatis@beneschlaw.com

February 14, 2025

Honorable Valerie Figueredo  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

**Re: *Vinci Brands LLC v. Coach Services, Inc., et al.*, No. 1:23-cv-05138-LGS-VF –  
Vinci's Letter Motion to Seal**

Dear Judge Figueredo:

Pursuant to Rule I.g.2 of Your Honor's Individual Practices in Civil Cases, Vinci Brands LLC ("Vinci") respectfully requests Your Honor's approval to file under seal KSNY54080 as referenced in Vinci's February 14, 2025 Letter Regarding Discovery Deficiencies. Vinci designates this document as Exhibit F to the Deficiency Letter.

Vinci seeks to file Exhibit F under seal to allow KSNY an opportunity to permanently seal it as a document that has been marked Confidential by KSNY pursuant to the Stipulation and Confidentiality Agreement and Order (ECF 233) (the "Confidentiality Stipulation"). However, Vinci takes issue with KSNY's designation of this document, as it does not contain any confidential information. Thus, Vinci will be requesting that KSNY de-designate this document.

To ensure its compliance with the Confidentiality Stipulation, Exhibit F is submitted with the Letter Motion to Seal for the Court's consideration.

**MEMO ENDORSED**

A handwritten signature in black ink, appearing to read 'V. Figueredo', written over a horizontal line.

**HON. VALERIE FIGUEREDO  
UNITED STATES MAGISTRATE JUDGE**

Dated: 2/18/25

The motion for a provisional seal is granted. KSNY is directed to file a motion to permanently seal the document by March 18, 2025 or the document will be unsealed. The Clerk of Court is directed to terminate the gavel at ECF No. 760.

Very truly yours,

BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP

/s/ Michael A. Vatis

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